

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	CC Docket No. 95-116
Telephone Number Portability)	

**REPLY COMMENTS OF
OKLAHOMA RURAL TELEPHONE COMPANIES**

**Atlas Telephone Company
Beggs Telephone Company
Bixby Telephone Company
Canadian Valley Telephone Company
Central Oklahoma Telephone Company
Cherokee Telephone Company
Chickasaw Telephone Company
Dobson Telephone Company
Grand Telephone Company
Hinton Telephone Company
KanOkla Telephone Association, Inc.
McLoud Telephone Company
Medicine Park Telephone Company
Oklahoma Telephone & Telegraph, Inc.
Oklahoma Western Telephone Company
Panhandle Telephone Cooperative, Inc.
Pinnacle Communications
Pioneer Telephone Cooperative, Inc.
Salina-Spavinaw Telephone Company
Santa Rosa Telephone Cooperative, Inc.
Shidler Telephone Company
South Central Telephone Association, Inc.
Southwest Oklahoma Telephone Company
Terral Telephone Company
Valliant Telephone Company**

The Oklahoma Rural Telephone Companies ("Oklahoma RTCs") submit these reply comments in response to the initial comments of other participants in this proceeding. Specifically, the Oklahoma RTCs dispute Sprint, AT&T and wireless carriers' contention that the disparity between wireline and wireless rate centers does not

pose a technical, regulatory and significant public interest impediment to wireless-wireline LNP. Additionally, the Oklahoma RTCs echo the arguments of other participants to this proceeding who advocate that the Commission should not change to the current 4-day porting interval. Like those commenters advocating no change to the porting interval¹, the Oklahoma RTCs encourage the Commission to await the recommendations of the North American Numbering Council who is currently conducting meetings with industry participants to reach a consensus on this very issue. Finally, the Oklahoma RTCs recommend that the Commission extend the reasoning of its January 16, 2004, *Waiver Order*² to implementation of LNP generally by small carriers and waive its requirement until the routing and rating issues are resolved.

Foreign exchange ("FX") services are not a ubiquitous solution to the competitive disparity issues or the technical impediments rural ILECs such as the Oklahoma RTCs face with respect to wireless-wireline portability. Certain commenters to this proceeding make the erroneous assumption that *all* LECs can serve former wireless customers with "their existing FX services"³ and that "an ILEC should have little difficulty serving a ported-in customer using such arrangements."⁴ Likewise, Nextel and CTIA believe that an ILEC can rely upon an FX service, irrespective of cost, to effectively link the wireless customer's previous rate center to the porting-in ILEC's rate center.

While such arrangements may be viable alternatives in an RBOC environment where the wireless carrier and the customer switching its service are both connected with

¹ See, e.g., Comments of Qwest Corporation, p. 7; see also, Comments of SBC Communications, Inc., p. 12; see also, Comments of Verizon, p. 12; see also, Comments of United States Telecom Association, p. 5; see also, Comments of BellSouth Corporation, p. 20.

² *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, *Order*, FCC 04-12 (rel. Jan. 16, 2004). ("Waiver Order").

³ Sprint Comments, p. 12.

⁴ Comments of AT&T Corp., p. 5.

the RBOC's network, they fail in areas served by rural carriers like the Oklahoma RTCs. The Oklahoma RTCs do not provide FX services to end users that reside or are served by a rate center outside their service areas. Moreover, the Oklahoma RTCs do not share a common point of interface in the LATA with wireless carriers where an "exchange" of ported local numbers could take place. Nevertheless, the wireless carriers contend that rural LECs such as the Oklahoma RTCs should bear the cost of transporting calls to numbers ported from their rate center as well as the cost of transporting calls to ported numbers from the wireline carrier's rate center. Thus, the disparity between rate centers provides the wireless carriers with a significant competitive advantage, irrespective of rate design challenges which must be overcome at the state level, and completely disregards the federal Act's process for interconnection and exchange of traffic.

As stated above the Oklahoma RTCs concur with the comments of other ILECs in this proceeding that advocate retention of the current four-day porting interval. The North American Numbering Council is currently evaluating the porting interval with participation of many industry experts. The Oklahoma RTCs believe that this industry consensus approach has worked well with respect to other numbering issues and the Commission should allow the process to run its full course. Therefore, the Commission should not mandate any changes to the current porting interval.

The Oklahoma RTCs look forward to fully participating in this proceeding and providing additional comments and clarification as necessary to fully advise the Commission of the distinct differences between the implementation and operation of LNP in areas operated by RBOCs as compared to the issues which arise when

implementing LNP in rural areas where wireless carriers do not connect with the network of the incumbent LEC.

Respectfully submitted,

OKLAHOMA RURAL TELEPHONE
COMPANIES

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